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ABSTRACT

This paper explores three audience models which have traditionally animated American communications policy: the Effects Model, in which the audience is victim; the Marketplace Model, in which the audience is consumer; and the Commodity Model, in which the audience is a coin of exchange. In separate sections, the models are defined, their varying elements are listed, and quotations from speeches, judicial opinions, and rulemaking procedures demonstrate their applications or manifestations. The paper also warns that while it is possible to distill these three distinct models of the audience from the work of policy makers, most players in the process will adopt whatever model suits their purpose. The paper then goes on to outline how each of these models might evolve in a new media environment without structural limitations, noting that what specifically needs to be considered is what becomes of these models when: (1) all who wish to electronically communicate to a mass audience are free to do so; and (2) people can pay directly for the media they consume. Finally, the paper suggests developing an Exposure Model of the audience which would embrace the effects, marketplace, and commodity models, and create a more unified system of audience analysis to inform public policy. (Thirty-one references are attached.) (PRA)

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Audience Models in Communications Policy

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Audience Models

in Communications Policy

For the better part of this century, the official goal of American communications policy has been to serve the "public interest, convenience, or necessity" (Federal Radio Commission, 1928). Putting aside the actual quality of service that the public has received, it's difficult to imagine a policy that hasn't somehow cloaked itself in the "public interest." For those who deal with media law and regulation, the relevant public is almost always an audience. Hence, to argue for or against some law or regulation one must conjure up a vision of the audience that portrays its needs, its wants, its weaknesses, or perhaps even its economic value. No single vision of the audience, however, has dominated the policy making process. Instead, different, sometimes contradictory, models of the audience have been advanced at different times, allowing diverse concerns to claim the mantle of the public interest.

I should note at the outset that my use of the term "model," may be a bit generous. A review of the policy making process does not reveal clearly articulated, uniformly understood, concepts of the audience. More often, the models are implied rather than explicit. They emerge in bits and pieces from judicial opinions, rulemaking procedures, and law articles. As such, they can easily elude notice. My purpose here is to draw

them out so their implications can be more fully considered. In doing so, I will state the elements of each model more baldly than even those who invoke them might wish.

A short story of media regulation

To appreciate the audience models that have animated public policy, one should recognize the context in which they have been used. At the expense of greatly oversimplying a long and complicated history of legislation, rulemakings, and court cases, this section identifies certain tensions that have unleashed these disparate notions of the audience.

In the United States, the story of media regulation is one of a struggle between government control of the media and reliance on a largely unregulated marketplace to serve the public interest. For print media, this has never been much of a fight. The clear applicability of First Amendment protections to "the press," as well as the conventional wisdom that all who wished to publish were free to do so, has tipped the scales heavily in favor of the marketplace. For broadcasting and the electronic media the balancing act has been much trickier.

From the earliest days of broadcasting, there was widespread concern that the marketplace could not be relied upon to give the people what they needed. The most serious deficiency in the broadcast marketplace was a shortage of frequencies relative to the number of people who wished to use them. This so called "scarcity" argument sustained considerable government regulation of broadcasting, including programming requirements deemed to be

in the public interest.

The broadcasters' reliance on advertising for financial support has further rationalized government regulation. This method of funding took hold in the 1920's and has accounted for virtually all industry revenues ever since. While it has been argued that advertiser support is consistent with the public interest because it requires broadcasters to "give the people what they want," many are unconvinced. Critics point out that broadcasters actually cater to advertisers, not the wishes of the public. They are, therefore, unlikely to serve small or otherwise undesirable audiences, especially if there are only a few stations in the market. Moreover, people have no way to express the intensity of their program preferences as might be the case if they paid directly for the media they consumed. Consequently, reliance on the marketplace to serve the public interest was suspect.

Because of these oddities, broadcasting has been ripe with contradictions and occasions for government regulation. On one hand, broadcasters have been expected to maximize their audiences and sell them to almost anyone willing to pay. On the other hand, they have been "trustees" of the public's airwaves and compelled to provide programming, even if it were not in their economic self interest to do so. Underpinning these two philosophies were very different ways of thinking about the audience. Were audience members potential victims to be protected? Were they rational consumers making appropriate

program choices? Or were they simply a commodity to be bought and sold? Depending upon one's view of the audience, rather different policies could be prescribed.

Strangely enough, the same market deficiencies that led policy makers to imply one or another model often allowed them to avoid an explicit declaration of their model. As long as the system was somehow faulty, a final judgement on the nature of the audience itself was premature. That situation is coming to an end, since changes in the structure and funding of electronic media have begun to ameliorate those deficiencies. As this happens, it seems likely audience concepts which have been implied or fragmentary will have to emerge from beneath the surface and be considered in their own right.

The Effects Model: Audience as Victim

It's common to represent the audience as a potential victim of the mass media. The notion that people are somehow harmed by what they hear or see is as old as the media themselves. On one hand, this model of the audience has great intuitive appeal, as reflected in popular opinion about the "power of the media." On the other, an "effects" model of the audience has the weight of "scientific" research and theory behind it, ranging from early work on propaganda and attitude change, to more contemporary notions of cultivation and agenda setting. This potent combination, has allowed policy makers to summon up an effects model of the audience with considerable success. The model, such as it is, has the following elements.

1) Audience members are vulnerable to the intrusive nature of media.

2) The media can cultivate an appetite for vulgar, hateful, or trivial programming.

3) Audience members may chose to consume media materials that are not in their own best interests.

4) The public interest is served by a media system that limits exposure to undesirable programming and promotes exposure to meritorious content.

The effects model manifests itself in a number of different ways. The most obvious applications are found in regulations designed to protect the public from specific categories of "harmful" content. Among the offending materials are obscenity, violence, and certain forms of commercial speech. Government efforts to assess and control these have been well documented elsewhere (e.g., Lowery & DeFleur, 1987; Rowland, 1983). Of course the audience of greatest concern is children. Well before the arrival of broadcasting, children were judged to be a special category of people particularly suseptible to harm. The easy accessibility of electronic media has only heightened anxieties.

The most apt example of the effects models in contemporary policy making is the FCC's on-again-off-again battle with indecency in broadcasting. In the late 1980's Ronald Reagan's commission, which had acted so vigorously to reduce government intervention in broadcasting, took several stations to task for airing indecent material. In doing so, the commission unsettled

an easily understood, if simple-minded, body of law that prohibited broadcasting certain words at times of the day when children were likely to be in the audience (FCC v. Pacifica Foundation, 1978). Instead, the commission explored a blanket prohibition on indeceny, which would have reduced the adult audience to hearing "only what is fit for children" (Butler v. Michigan, 1957, p. 383). These actions were rooted in a belief that exposure to indeceny can cause significant harm to the audience - an argument that persuaded Congress to legislate a round-the-clock ban on indeceny despite the fact that a) indecency in other contexts is constitutionally protected speech, and b) the scientific evidence of harmful effects on children, let alone adults, is equivocal. (Comments of Action for Children's Television, et al., 1990)

As problematic as these regulations may be, the fact is that governments have always succeeded in branding some forms of speech harmful and have thereby prohibited or punished their expression. This was true before the days of broadcasting, and will undoubtedly remain so long after technology makes electronic media legally indistinguishable from other forms of publication. There is, however, another concept of victimization that has driven the regulation of broadcasting.

Even if people are not harmed by exposure to specific kinds of vulgar or deceptive messages, they may nonetheless be victimized by the poor judgement of the masses and the willingness of the media to give them what they want. Under this

version of the effects model, it is not so much a question of protecting people from that which is harmful, as it is ensuring that people receive that which is good.

Nowhere are the elements of this alternate effects model given greater force than in Newton Minow's "Vast Wasteland" speech of 1961 - arguably the most influential public address ever made by an FCC Chairman. Minow takes as given the "overwhelming impact" (Minow, 1978, p. 284) of broadcasting on the American people. While naming a few "good" television programs, he chides broadcasters for their slavish pursuit of higher ratings, and asserts that "if parents, teachers, and ministers conducted their responsibilities by following the ratings, children would have a steady diet of ice cream, school holidays and no Sunday School" (p. 286). Throughout, he makes it clear that people are not served just by giving them what they want - "some say that the public interest is merely what interests the public. I disagree." (p. 283)

One senses that Minow is a bit uncomfortable with how his own remarks portray the American people, for he is at pains to credit them with "good sense and good taste" and being "wiser than some of the broadcasters - and politicians - think." (p. 286). In the end, he finesses the issue by asserting that "most of television's problems stem from a lack of competition ...with more channels on the air, we will be able to provide every community with enough stations to offer service to all parts of the public." In the early 1960's, at least, it was possible to

indict commercial media without rendering a final verdict on the audience itself. Deficiencies in the marketplace were more easily blamed for the media's failure to give the people what they really wanted.

The rather abstract assertion that under limited channels the choices of the mass audience could result in an inappropriate mix of programming was translated into public policy through a succession of FCC actions and court cases sometimes known as the radio format controversy. The central question of the controversy was whether the commission should preserve a unique radio format, like classical music, even though the station's owner believed a more popular format could be found. In 1974, the Court of Appeals provided its answer.

> There is a public interest in a diversity of broadcast entertainment formats. The disappearance of a distinctive format may deprive a significant segment of the public of the benefits of radio, at least at their first preference level. (Citizens Committee to Save WEFM v. FCC, 1974, p. 262)

Like Minow, the court pointed out deficiencies in the marketplace that caused the extinction of certain formats which would otherwise be economically viable. Once again, blame was placed on the system rather than the behavior of listeners. As long as these flaws persisted, it was the government's responsibility to protect the public interest by providing diversity in both news and entertainment. In reaching this

conclusion the Court of Appeals seemed fully in step with the Red Lion decision which had proclaimed "the right of the public to receive suitable access to social, political, esthetic, moral, and other ideas..." (Red Lion Broadcasting Co., Inc. v. FCC, 1969, p. 390).

By the end of the 1970's cable, the "television of abundance," made it more difficult for policy makers to avoid the implications of an effects model of the audience. As the FCC confronted the growth of cable it recognized a potential threat to one if its most cherished objectives. The commission had a long history of favoring news and public affairs programming, as well as encouraging "localism" in broadcasting. These biases were motivated, at least in part, by a desire to keep people informed about issues of public importance. Cable television, however, seemed capable of undermining that function by diverting viewers to less up lifting fare. One passage in the commission's 1979 report on the relationship between cable and broadcasting is particularly revealing.

> Television may have an important effect in shaping the attitudes and values of citizens, in making the electorate more informed and responsible, and in contributing to greater understanding and respect among different racial and ethnic groups... Historically, the FCC has encouraged particular types of programming - local news, public affairs, instructional programs - on these grounds. To the extent that a change in broadcast-cable policy would

> dramatically change the amount by which these programs are not only broadcast but viewed, these issues could be an important component of a policy debate (Federal Communications Commission, 1979, pp. 638-639).

In a line of reasoning that is the mirror image of its indecency rules, the FCC expressed concern that undesirable social consequences might flow from people not watching certain content. Surely this argument could be made in a market environment where entry is unconstrained by limited channels, and audience members are able to pay directly for what they consume. In such a world, the effects model suggests a policy prescription that people not only have a right to hear diverse ideas, but that government has an obligation to enforce a certain breadth of exposure.

With the possible exception of providing "equal opportunities" under Sec. 315 of the Communications Act, or some attempts at balancing audiences under the old Fairness Doctrine, few public policies have explicitly sought to provide an audience for certain viewpoints. In part this is because the same market deficiencies that justified government intervention rendered the need for audience guarantees moot. In a world of limited channels, the right to speak is effectively a right to be heard. Perhaps more importantly, though, it is because another model of the audience began to dominate policymaking in the late 1970's and 1980's.

The marketplace model: Audience as Consumer

An alternative view of the audience casts them in the role of consumers who enter the marketplace and select the products that suit their tastes. Like the effects model, this concept of the audience has considerable intuitive appeal. Most Americans are comfortable with the idea of entering a market and shopping wisely. The marketplace model is also at the heart of a powerful body of economic theory. In fact, as early as the 1950's neoclassical economists began developing a variant of their theories that, by the 1970's was holding sway among many policy makers (see Noll, Peck, & McGowan, 1973; Owen & Wildman, 1991; Steiner, 1952). The elements of the marketplace model are:

1) Audience members are rational, well informed individuals who will act in their own self interest.

2) Audience members come to the media with well formed program preferences which cause them to choose specific content.

3) The public interest is served by a media system that is fully responsive to audience preferences as revealed in their choice of programming.

This concept of the audience helped rationalize the move toward deregulation that began during the Nixon administration, continued through the Carter presidency, and reached its zenith during the Reagan years. No one argued the marketplace model with more conviction than Mark Fowler, chairman of the FCC during most of the 1980's. Nowhere is Fowler's vision made more plain

than in his 1982 manifesto, "A Marketplace Approach to Broadcast Regulation" (Fowler and Brenner, 1982). There, in direct contradiction of Newton Minow, he declares "the public's interest ... defines the public interest." (p. 210)

The ascendancy of the marketplace model is evident in a number of regulations and court decisions that rely upon the choice-making of audiences to guide public policy. Once again, the radio format controversy illustrates the point. By the mid-1970's, the commission was determined to test, and hopefully overturn, the requirement that it be involved in format selection. In a 1976 Memorandum Opinion and Order, which made significant reference to a paper by economist Bruce Owen (see Owen, 1977), the commission wrote.

> ...the marketplace is the best way to allocate entertainment formats in radio, whether the hoped for result is expressed in First Amendment terms (i.e., promoting the greatest diversity of listening choices for the public) or in economic terms (i.e., maximizing the welfare of consumers of radio program). (Federal Communications Commission, 1976, p. 863).

The commission went on to argue that the Court of Appeals strategy to "maximize format diversity through regulatory fiat could very well result in a dimunition of consumer welfare." (p. 684). While recognizing the imperfections of the marketplace, in 1981, the Supreme Court put the matter to rest by finding that the commission could rely "...on market forces to promote

diversity in radio and entertainment formats and to satisfy the entertainment preferences of listeners." (FCC v. WNCN Listeners Guild, 1981, p. 604)

The foregoing model is best thought of as an economic model in which audience members select the programs or formats to suit their tastes. Whether the same model of the audience underlies the "marketplace of ideas" is another matter. The latter is undoubtedly one of the oldest and most powerful metaphors used in communications policy. As a result, one might imagine that the role of the audience in such a marketplace was well understood. If, as First Amendment theory holds, the truth will ultimately emerge from a clash of ideas, surely the audience must play a crucial role in the process. Does this metaphor assume, like the economic model, that audience members will choose ideas to suit their tastes? Does that mean people will elect to hear diverse ideas if they are available? Does the metaphor further require that people engage in thoughtful reflection upon what they have heard? If not, how can the marketplace of ideas be expected to work? To these questions, policy makers have offered surprisingly few answers.

The most ardent proponents of the economic model are inclined to argue that these questions are largely irrelevant. All that the First Amendment requires is that individuals have a "right to speak." According to Owen (1975)

> ...this very freedom to enter the market, to test consumer response, which is guaranteed by the competitive mechanism,

> may be all that is essential to freedom of expression (from a constitutional viewpoint) provided consumers demand the right information about political matters (emphasis added). Surely the framers of the constitution did not have in mind an absolute right to survival in the marketplace for all potential purveyors of ideas. (p. 27).

Under this model, the audience is sovereign over the marketplace. If the audience demands diverse content, then the marketplace will provide it in its most appropriate forms, especially if no provider is prohibited from entering the marketplace. This result would be very much in keeping with the more recent rhetoric of the commission and courts. If, on the other hand, the public does not demand diversity, none will be forthcoming. For true believers in the marketplace, that too is an acceptable policy outcome. Others, would surely be less sanguine about such a result.

The commodity model: Audience as coin of exchange

There is a third model of the audience that seems to co-exist with each of the other two. On any number of occasions, the government has conceptualized audiences as a commodity, leaving aside questions of victimization or rational choice. This model is less wedded to any notion of the audience as individual decision-makers and is more a reflection of the fact under advertiser support, they are a common coin of exchange. The assumptions of the model are:

1) Audiences have an economic value that is measured by

their size.

2) Measurements of size may function as a coin of exchange in economic transactions as well as policy making.

3) Commercial media must be allowed to create and sell audiences if they are to exist.

4) The public interest is served by a media system that provides for an equitable distribution of revenues based on the commodity value of the audience.

Most laws and regulations have some effect on the financial condition of the media and related industries. Since these policies have an impact on "the bottom line," they attract the attention of many participants in the policy making process. Even the FCC, which in recent years has favored increased competition, cannot be oblivious to the economic consequences of its policies. After all, the commission is responsible for seeing to it that broadcasting serves the public interest. If broadcasters are driven out of business by some ill-conceived policy, it could compromise the commission's most sacred mandate.

While profit and loss statements would seem an obvious source of information for policy makers, these data are not always used. For one thing, the commission long ago stopped collecting financial statements from broadcasters. For another, economic injury might be too far advanced by the time it shows up on company ledgers. As an alternative, policy makers will often use audience information, especially ratings data, as a surrogate for industry revenues.

One of the most straight forward uses of the commodity model can be found in the workings of the Copyright Royalty Tribunal (CRT). Under compulsory licensing arrangements, cable systems must pay for the right to carry certain broadcast signals. Each year, this creates a fund worth hundreds of millions of dollars. The CRT's job is to determine how that fund should be divided among various claimants. Chief among the claimants is the Motion Picture Association of America (MPAA), which has argued that copyright owners should receive roylaties in direct proportion to how much their programs were actually viewed.

To make the case that it deserves the largest piece of the pie, MPAA annually commissions a special study from A.C. Nielsen, based on market-by-market ratings data. Nielsen provides MPAA with a list of every qualifying program, the number of quarter hours it was broadcast, and the number of cable households that viewed each quarter hour via retransmissions of "distant" signals (Motion Picture Association of America, 1988). While the CRT is free to allocate funds in whatever manner it chooses, MPAA's approach has become the method of choice. In this application, audience size becomes a kind of weight that determines the distribution of revenues, as is the case in more direct exchanges between buyers and sellers.

A fascinating, if somewhat more convoluted, example of how the goverment has used the commodity model of the audience, emerges in the cases of "economic injury." Here, the question before policy makers is whether competition for a broadcaster's

audience can be so damaging as to require that the licensee be protected from harm. While the courts initially ruled this was none of the government's concern (FCC v. Sanders Brothers Radio Station, 1940), by the 1950's the Court of Appeals had qualified that hands off policy. The court reasoned that:

> To license two stations where there is revenue only for one may result in no good service at all. So economic injury to an existing station, while not in and of itself a matter of moment, becomes important when on the facts it spells dimunution or destruction of service. At that point the element of injury ceases to be a matter of purely private concern. (Carroll Broadcasting Company v. FCC, 1958, p. 443)

While the court's motivation was to protect the public from being "victimized" by ruinous competition, it did so by recognizing the commodity value of the audience, and preserving that commodity for the exclusive use of an incumbent licensee.

In practice, the commission made little use of this doctrine in granting or denying broadcast licenses. However, as soon as it seemed cable television might "divert" audiences from local broadcasters, the FCC applied the logic of economic injury with a vengeance. Through the 1960's and early 1970's it implemented a number of measures that diminshed cable's ability to compete for the broadcaster's audience (see LeDuc, 1973). These actions were largely pre-emptive, and often taken in explicit recognition that some members of the public might be worse off as a result. As the commission noted in one of its early decisions denying a

cable system the means to import a distant signal:

> True, a grant of the instant application would permit the rendition of better service by the CATV, but at the expense of destroying the local station and its rural coverage. The CATV would permit the urban areas a choice of coverage, but the local station...serves a wider area. (Federal Communications Commission, 1962, p. 464)

Through such rulings, the commission extended the use of the commodity model. Not only could audiences be quarantined for their own good, some members of the audience could be denied freer choice so their commodity value could subsidize service to rural areas.

More recently, the FCC has handled claims of audience diversion in the context of its rules on syndicated exclusivity. These rules, which went into effect in 1972, were intended to ensure that broadcasters who bought the exclusive rights to syndicated programming would not have that privilege undermined by a cable system that imported a distant signal with the same program. The import, it was assumed, would divert some audience that rightly belonged to the local station. While the commission later dropped the rule, in 1988 it decided to reimpose syndicated exclusivity. During that proceeding, the parties at interest all submitted analysis of ratings data purporting to show that audience losses did or did not occur in the absence of the rule. In reimposing the rule, the commission reasoned,

> ...the ability to limit diversion means broadcasters will be

> able to attract larger audiences, making them more attractive to advertisers, thereby enabling them to obtain more and better programming for their viewers. ("The whys and wherefore's of syndexII," 1988, pp. 58-59)

The commodity model of the audience has a chameleon-like quality. It is a suitable companion to either the effects model or the marketplace model, which are themselves profoundly at odds. One may argue that audience choices are dangerous in their consequences, or that they are an appropriate expression of rational preferences and still recognize that, in the aggregate, those choices create a commodity. One may also dispense with the first two models altogether and deal with the commodity value of the audience on it own terms.

Concluding Comments

While it is possible to distill three rather distinct models of the audience from the work of policy makers, one should not conclude that every party with an interest in policy making advocates only one or two models. Though there are certainly faithful adherents to some models, most players in the process will adopt whatever model suits their purpose. This is especially true of the private interests that vie for advantage in the arena of public policy. One might, for example, find a broadcaster using a marketplace model to argue against format regulation at one point, and invoking a victimization model to argue for protection from economic injury the next. Because structural deficiencies in the market have tended to mask

audience models, contradictory views of the audience are not always apparent.

I've suggested that technological developments are gradually minimizing flaws in the marketplace. While we can expect the "blue sky" of technological abundance to be clouded over for some time to come, it is useful to imagine how these models might evolve in a new media environment without structural limitations. Specifically we should consider what becomes of these models when; a) all who wish to electronically communicate to a mass audience are free to do so, and b) people can pay directly for the media they consume.

Effects Model. Proponents of the effects model will have a more difficult time making their case in such a world. While I suspect there will always be policies designed to limit people's exposure to harmful content, policies that champion diverse or meritorious content will become increasingly problematic. On one hand, if a freely functioning marketplace produces the kind of pluralistic programming that many would hope for, policies that require such programming are simply unnecessary. If the marketplace fails to "deliver the goods," then one is left with the unenviable task of remedying this deficiency in some meaningful way.

The most likely solution would be to reinvigorate the so-called "right to hear" argument advanced by the Supreme Court in Red Lion - that is, make certain ideas available independent of demand for those ideas. With unlimited alternatives, however,

the problem with creating content for which there is no market is that no one will listen. As a result, the perceived ill effects that prompted the creation of this content will go unremedied. This is a policy that would be difficult to sustain.

If the effects model is to have force in public policy, it must assume a more intrusive form. Robert Entman has taken a logical step in that direction by talking not of the public's right to hear, but "the right to be exposed to diverse ideas" (Entman, 1991). It's not clear how this right would be operationalized, but it suggests encouraging a level of exposure that would not otherwise occur. Whether such a paternalistic policy will "play in Peoria" is another question.

Marketplace Model. The new media environment will require the fewest changes of the marketplace model. Indeed, it is for such an environment that this model was designed. If anything, we might expect a greater sanctification of choices in a market where sellers are free to come and go and consumers are free to express the intensity of their preferences in the prices they pay for programming.

The biggest challenge to this model will not be in its ability to rationalize economic choices, but in its compatability with the "marketplace of ideas." While some may insist the "right to speak" is all that either marketplace requires, I suspect many policy makers will put the marketplace of ideas to a sterner test. Specifically, they will ask to what extent the marketplace actually produces diversity of expression. This is a

test that the economic marketplace might fail to meet in one of two ways.

The first and most obvious measure of diversity is "diversity of content." Will the actions of buyers and sellers in this marketplace produce a diverse universe of programming for all who wish to partake? Skeptics argue that since unpopular ideas are likely to be unprofitable, they will be undersupplied by the marketplace (Entman, 1991). Hence genuine diversity will go unrealized. But even if there is a diverse universe of programming, the marketplace of ideas might still be an empty shell.

The second, more crucial, form of diversity might be called "diversity of consumption." Ironically, as the menu of content becomes increasingly diverse, each individual is in a position to consume an ever narrower diet of programming. In fact, much of what we know about human psychology and audience behavior suggests that this is precisely how "rational" people are likely to deal with diversity (Webster, 1989). If increasing diversity of content means that each individual is actually exposed to less diversity of expression, it's hard to see how such a result serves the marketplace of ideas.

If the economic marketplace fails to acheive diversity in either sense, it will be difficult for its proponents to imply that it is at one with the marketplace of ideas. In that event, the broad appeal of this model of the audience may be diminished.

Commodity Model. Strickly speaking, the commodity model of

the audience exists only in a world of advertiser supported media. To the degree that the new media environment features direct payments for programming, concepts about the commodity value of the audience will have to change. In all likelihood, though, this will be more a change in vocabulary than substance. Under either method of funding, the audience will still be conceived of as a source of revenue. The fact that one approach depends on the value of audiences to advertisers, while the other depends on the ability of audiences to pay fees will not make a fundamental difference in most applications of the model to public policy. At best, we might rename this the "money model" of the audience.

If this model undergoes any substantive change, it will be in the sophistication and range of its uses. To date, applications of the commodity model in policy making have been rather simplistic. Most uses of the model evidence a limited understanding of how the audience commodity is actually created and sold. MPAA's manipulation of ratings data, for example, ignores the fact that specific program audiences result as much from scheduling and audience flow as from the inherent appeal of the program. To argue, in effect, that the program's owner is the sole creator of its audience is foolish. Over the last decade there has been a growing body of literature on the audience and its relevance to public policy (e.g., Barwise & Ehrenberg, 1989; Besen, Krattenmaker, Metzger & Woodbury, 1984; Noam, 1985; Owen & Wildman, 1991; Webster & Lichty, 1991).

Whether this work will have a perceptible influence on the real world of policy making remains to be seen.

Indeed, I would hope we could develop an "exposure model" of the audience that embraces the effects, marketplace, and commodity models, and creates a more unified system of audience analysis to inform the public policy. Such an approach would see patterns of exposure to media content as an occasion for creating either pro- or anti-social effects, as well as a qualified index of audience preferences (Webster, 1990). Certainly, if the fate of the effects model is to enforce the public's right to be exposed to diverse ideas, and the vitality of the markeplace model is conditioned upon a diversity of consumption, then understanding exposure will be increasingly important to communications policy no matter which model of the audience is advanced.

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